

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

IN RE: AQUEOUS FILM-
FORMING FOAMS PRODUCTS
LIABILITY LITIGATION

MDL No. 2873

Master Docket No. 2:18-mn-2873

This Document Relates to:

Civil Action No. 2:23-cv-28-RMG
State of Wisconsin v. 3M, et al.,

MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law in Support of Motion for Leave to File Second Amended Complaint and accompanying exhibits, Plaintiff, State of Wisconsin, moves this Court for an Order pursuant to Federal Rule of Civil Procedure 15(a)(2) granting the State leave to file its proposed Second Amended Complaint in this action.

Counsel for the State conferred with Co-Lead Counsel for Plaintiff prior to the filing of this Motion. Co-Lead Counsel for Plaintiff provided their consent. Furthermore, pursuant to Local Rule 7.02, counsel for the State conferred with counsel for Defendants that have appeared in this action prior to the filing of this Motion and shared with them the Second Amended Complaint and a redline comparison of the Second Amended Complaint to the State's First Amended Complaint. The State received no objection to the relief sought herein.

PLEASE TAKE FURTHER NOTICE, that pursuant to Local Rule 7.06, opposing affidavits and memoranda of law, if any, must be filed within fourteen days of the filing of this Motion, unless the parties agree otherwise or the Court imposes a different schedule.

RESPECTFULLY SUBMITTED this 1st day of **November**, 2024.

Dated: November 1, 2024

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